

Before the
Federal Communications Commission
Washington, D.C. 20554

In the matter of:

Amendment of Parts)	
73 and 74)	
to further implement the)	RM -11810
Local Community Radio Act)	
of 2010 and make)	
other improvements to the)	
Low Power Radio Service)	

WHCP-LP hereby files comments in support of the REC Networks petition to improve the service rules applicable to LPFM stations consistent with the Local Community Radio Act to better serve the public interest, while fully safeguarding the interference concerns central to all broadcast facilities.

Introduction

WHCP-LP signed on July 4, 2015 and has painstakingly built a needed new local community radio service in the Cambridge, Maryland and immediately surrounding area. WHCP-LP is currently the only locally-owned and locally-operated radio station in this community of just over 12,000. WHCP relies on over four dozen volunteers for its day-to-day operations. We provide an eclectic blend of locally produced Blues, Oldies, Jazz, Independent Music, Celtic, Country, and Big Band in addition to a selection of highly acclaimed and otherwise unavailable syndicated programs. We operate the only reading service for the Blind and visually impaired via our MidShore Reading Service, which reads the local weekly newspapers as well as

books and magazines to a growing audience via our FM subcarrier.

In the coming decades it is expected that Dorchester County will slide from being the largest county in the State of Maryland to the 10 largest due to land-loss from subsidence, erosion and other natural factors. Many towns and islands will cease to exist, and others have already succumbed (Barren Island, Jane's Island, Bloodworth Island, and Applegarth/Lower Hooper's Island). Dorchester County and Norfolk have been identified as "Ground Zero" in the Mid-Atlantic region to succumb to these effects.

WHCP's *MidShore MidDay* signature noontime public affairs program explores these traumatic looming events with our government representatives, scientists, and environmental nonprofits through with our help of a cadre of Community Journalists. We cover the community in depth interviews, focusing on the City Council, full-length Candidate Forums, and a host of upcoming community events and activities of the very active nonprofit and faith communities. Our station is the Official Radio Station for the Dorchester Goes Purple campaign to raise awareness of the Opioid epidemic by sharing deeply personal sagas and share prevention and recovery strategies that are working, but need to work even better.

Cambridge is the county seat of this rural, highly vulnerable low lying community. The challenges here are exacerbated by being among the most economically challenged counties in the State with per capita income of only \$25,139¹.

Many in the community tell us the station is their lifeline to thoughtful information, and passionate experts in a wide variety of musical genres. We have over 300 community members that voice our station ID's around the clock and are grateful for the

¹ 2010 U.S. Census

dozens of underwriting sponsors and scores of active station members and individual contributors. We rely on no government support for our operations, but have been the grateful recipients of local foundations that provided the funds for the move into new downtown storefront studios with a sidewalk performance studio that hosts ongoing high caliber live music events, as well as three interoperable state-of-the-art control rooms and two announce booths used by the MidShore Radio Reading Service. We also stream worldwide via whcp.org and have regular pockets of listeners as far away as Germany and Brazil.

WHCP-LP Supports the 250 Proposed Power Increase With Interference Safeguards

Despite the vibrancy of our local service, we do not cover but perhaps ½ of the entire county of license. Notably the “down county” communities most at risk from flooding are just beyond our signal, as are the far eastern sections of the County.

As a relatively fragile LPFM signal we are mindful that one station’s power increase can be another station’s potential for interference. But the case for improved service in a County with copious “local provided noncommercial” white service areas is acute. The proposal for the 250 watt service limit, subject to the proposed interference rules is, in our experience, compelling. We support it fully applaud the thoughtful leadership of REC NET in bringing this important issue forward.

WHCP Supports the Proposed Section 73.815 Regime of Interference Protection

More than ample time has passed to demonstrate that the interference concerns of existing broadcasters have proven unfounded in the establishment of the LPFM service. The existing body of engineering evidence cited by REC NET is thoughtful and comprehensive. The substantive service

improvements possible by adoption of the technical recommendations are significant and no material adverse impacts are to be expected. The better access to the reserved band frequencies, IF protection consistency, and use of directional antennas and other 73.215 time proven criteria will help local communities such as ours enjoy the benefits of service that committed community volunteers can provide.

The business model of LPFM's is a dramatic break from the failures of the "radio consolidation is good for communities" movement that history demonstrates resulted in the wholesale loss of thousands of once vibrant local radio services in recent decades. LPFM is a bold experiment, and in our instance, we submit one that is working well, but one that can work significantly better with the modest service improvements being proposed under RM-11810.

Non-technical Proposals Under RM-11810 Are Sound Policy

Although WHCP was able to meet the 18 month Construction Permit timetable with one month to spare, our founder and General Manager was a seasoned broadcast engineer with a remarkably supportive network of fellow engineers and station managers across the country. Most LPFM's would not be expected to be fortunate enough to have access to so many volunteer resources contributing time, money and equipment to assist a recently retired network radio colleague establish a new LPFM station. For these reasons, we agree that the 36 month timetable is much more realistic for the large number of meritorious local community groups working hard to get their station on the air, but who lack volunteers with such established broadcast experience and networks of resources.

We also agree that the localism lodestar is well governed by the 10/20 rule and that flexibility in primary contour overlap with commonly owned translators is a common sense improvement

that is especially relevant in sparsely populated rural areas such as on Maryland's MidShore region.

Additionally, the proposed consistency with translators for minor change distances is sound policy.

Moreover, the proposal to save original construction permits and remove the 3-year waiting period, coupled with a new anti-trafficking safeguard requiring assurance that transfer sales involve no more than reimbursement of the depreciated value of the assets are very pro-public service proposals supportive of the rationale behind the LCRA. WHCP management is aware of potential trafficking issues regarding other existing operations where licensees have been approached with exorbitantly creative proposals that caught the attention of struggling nonprofit licensees. Similarly, the ability for other organizations who are fully qualified as LPFM licensees to save the permits of the many grassroots CP recipients who, for a variety of reasons, were essentially "in over their heads" in completing successfully the many practical steps required to become operational.

For all of these reasons, we urge the Commission to act expeditiously and favorably on the thoughtfully designed proposals embodied in RM-11810 by REC Networks.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Michael Starling", with a stylized flourish at the end.

Michael Starling
General Manager, WHCP-LP, Cambridge, Maryland